

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

JOHNNY M. HUNT,

Plaintiff,

v.

SOUTHERN BAPTIST CONVENTION;
GUIDEPOST SOLUTIONS LLC; and
EXECUTIVE COMMITTEE OF THE
SOUTHERN BAPTIST CONVENTION,

Defendants.

Case No. 3:23-cv-00243

Judge Richardson
Magistrate Judge Frensley

**DECLARATION OF
ANTHONY M. COLLURA
IN SUPPORT OF MOTION TO
DISMISS THE COMPLAINT**

ANTHONY M. COLLURA declares under penalty of perjury under 28 U.S.C. § 1746 that the following is true and correct:

I, Anthony M. Collura, submit this Declaration in support of the motion by Defendant Guidepost Solutions LLC (“Guidepost”) to dismiss for lack of subject matter jurisdiction or, in the alternative, for failure to state a claim and hereby state, aver, and declare the following:

1. I am the Chief Operating Officer and Chief Legal Officer of Guidepost. I am fully familiar with the facts and circumstances of Guidepost’s engagement by the Southern Baptist Convention (the “SBC”) to conduct an investigation on behalf of the SBC’s Sexual Abuse Task Force (the “SBC Task Force”).

2. As stated in the Complaint in this action, Guidepost conducted the investigation pursuant to its engagement letter with the SBC (the “Engagement Letter”) by obtaining and reviewing documents and conducting witness interviews. At the end of

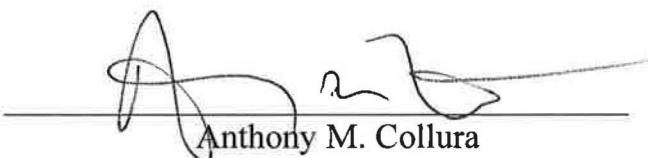
the investigation, Guidepost prepared and submitted a written report to the SBC Task Force (the “Report”).

3. I am informed and understand that Plaintiff Johnny M. Hunt (“Hunt”) has suggested that Guidepost published the Report to the general public. This is not accurate.

4. At the conclusion of its investigation, pursuant to the Engagement Letter Guidepost provided the Report to the SBC Task Force on or about May 15, 2022. The SBC Task Force (not Guidepost) then published the Report on the SBC Task Force website on or about May 22, 2022. The hyperlink to the website where the SBC Task Force published the Report is <https://www.sataskforce.net/updates/guidepost-solutions-report-of-the-independent-investigation>.

5. I declare under the penalty of perjury that the foregoing is true and correct.

Executed on the 2nd day of May, 2023 at New York, New York.



A handwritten signature in black ink, appearing to read "Anthony M. Collura", is written over a horizontal line. The signature is fluid and cursive, with a large loop on the left and a smaller loop on the right.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served through the Court's electronic filing system on the following:

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*Counsel for the Executive Committee of the
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on this 4th day of May, 2023.

s/John R. Jacobson